

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

2003-00434

In the Matter of:

AN ADJUSTMENT OF THE ELECTRIC )  
RATES, TERMS, AND CONDITIONS OF ) CASE NO. 2003-00434  
KENTUCKY UTILITIES COMPANY )

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**MOTION FOR FULL INTERVENTION**

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Come now the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), P.O. Box 11610, Lexington, KY 40576 and Kentucky Association for Community Action, Inc. (KACA), 101 Burch Court, Frankfort, KY 40601 by counsel, pursuant to 807 KAR 5:001 Section 3(8), and hereby move for leave to intervene as full parties in the above-referenced proceeding. In support of this motion, CAC and KACA state as follows:

1. CAC is a non-profit, 501(c)(3), community action agency which provides social services, including energy assistance and related services, to numerous low income residents of Kentucky Utilities' service territory. As such, it is likely to present issues and provide a perspective which is not likely to be presented by the other parties to this proceeding, and its interests are not adequately represented by other parties to this proceeding. CAC's participation will not unduly delay these proceedings.
2. KACA is a Kentucky non-profit, 501(c)(3) public interest corporation which represents Kentucky's twenty three (23) Community Action Agencies. KACA

operates the Low Income Home Energy Assistance Program (LIHEAP) in all 120 Kentucky counties and provides assistance to 150,000 low income households in the state each year. KACA also provides technical assistance on an on-going basis to the state's four Demand-Side Management (DSM) Programs operated by American Electric Power, Louisville Gas and Electric Company, Union Light Heat and Power, and Western Kentucky Gas. These programs provide a variety of conservation services for low income households.

3. In this proceeding, the Commission will examine the request by Kentucky Utilities Company for an adjustment to its rates, which if approved as requested could have a significant impact on the low-income clients served by CAC and the twenty three (23) community action agencies which are members of KACA.
4. CAC expects to present testimony from Jack E. Burch, Executive Director, and KACA expects to present testimony from Kip Bowmar, Executive Director. Additionally, either or both organizations may choose to present testimony from other witnesses not yet identified.
5. The intervention of CAC and KACA into this action is likely to present issues and facts that will not be adequately addressed or represented by any other party and will be helpful to the Commission in fully considering the matters without unduly complicating or disrupting this proceeding.
6. CAC and KACA respectfully request that they be granted leave for full intervention and to participate fully as parties in this proceeding, including the right to present testimony and exhibits, present witnesses, cross examine

witnesses, present argument and file briefs as allowed by the Commission.

  
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ACTION COUNCIL FOR  
LEXINGTON-FAYETTE, BOURBON,  
HARRISON AND NICHOLAS  
COUNTIES, INC. AND KENTUCKY  
ASSOCIATION FOR COMMUNITY  
ACTION, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing document has been served on the following persons:

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on this the 21<sup>st</sup> day of January, 2004.

  
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JOE F. CHILDERS